

Mark G. McDougal, OSB #89086
e-mail: mcdougal@kafourymcdougal.com
Natalie McDougal, OSB #04250
e-mail: nataliemcdougal@comcast.net
Gregory Kafoury, OSB #74166
e-mail: kafoury@kafourymcdougal.com
Kafoury & McDougal, Lawyers
320 SW Stark Street, #202
Portland, OR 97204
ph 503-224-2647; fx 503-224-2673

Jami Pannell, OSB #06249 (admission pending)
e-mail: anmlclin@lclark.edu
Animal Law Clinic
Lewis & Clark Law School
10015 SW Terwilliger Blvd.
Portland, OR 97219
ph 503-768-6848; fx 503-768-6917

Shauna Curphey, OSB #06306
Email: scurphey@nwcrc.org
NW Constitutional Rights Center
520 SW Sixth Ave., #1050
Portland, OR 97204

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

GREGG SCHUMACHER and LINDA)	
SCHUMACHER, individually and as)	
husband and wife, and GREGG)	No. CV 07 601 HU
SCHUMACHER FURS LLC dba)	
SCHUMACHER FURS & OUTERWEAR,)	MOTION TO MAKE MORE
)	DEFINITE AND CERTAIN
Plaintiffs,)	
)	
v.)	
)	
CITY OF PORTLAND, a municipal)	ON BEHALF OF DEFENDANTS
corporation; IN DEFENSE OF ANIMALS,)	IN DEFENSE OF ANIMALS,
a foreign nonprofit corporation; ANIMAL)	MATT ROSSELL, CONNIE
LIBERATION FRONT, an unincorporated)	DURKEE & KEVIN MIERAS
association; PEOPLE FOR THE ETHICAL)	

TREATMENT OF ANIMALS, INC., a)	
foreign nonprofit corporation; MATT)	
ROSSELL; KEVIN MEIRAS aka "Bluejay";))	Oral Argument Requested
CONNIE DURKEE; ALEX LILLI; JOHN)	
DOES 1-10; and JANE DOES 1-10)	
)	
Defendants.)	

LR 7.1 CERTIFICATION

The undersigned counsel of record for defendants hereby affirms that the parties made a good-faith effort through a telephone conference on May 11, 2007, between the undersigned and counsel for plaintiffs to resolve the disputes raised by this Motion and have been unable to do so.

ISSUES TO BE DECIDED

1. Whether plaintiffs' claims against the defendants (other than the City of Portland) are so vague or ambiguous that the particular defendants cannot reasonably be required to frame a responsive pleading.
2. Whether plaintiffs should be required to provide a plain and concise statement of the particular conduct engaged in by each particular defendant that gives rise to each of plaintiffs' claims against each particular defendant.

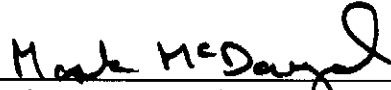
MOTION

Pursuant to F.R.C.P. § 12(e), defendants move to require plaintiffs to make a more definite statement of their claims against each particular defendant (other than the City). The current complaint does not state the particular conduct of moving defendants that form the basis of the state law claims against each defendant. Plaintiffs should be required to specify the conduct of each defendant that gives rise to each of the plaintiffs' state law claims against each particular defendant. This Motion is based on the accompanying Memorandum in Support of Motion to Make More Definite and Certain, and the plaintiffs' Complaint.

DATED May 11, 2007.

Respectfully submitted,

KAFOURY & MCDUGAL

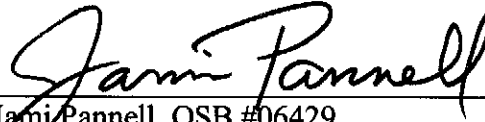
A handwritten signature in black ink, appearing to read "Mark McDougal", written over a horizontal line.

Mark G. McDougal, OSB #89086

Attorneys for Defendants

In Defense of Animals, Matt Rossell

and Connie Durkee

A handwritten signature in black ink, appearing to read "Jami Pannell", written over a horizontal line.

Jami Pannell, OSB #06429

Shauna Curphey, OSB #06306

Attorneys for Defendant Kevin Mieras

CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the foregoing Motion to Make More Definite and Certain on the following person(s) on the date indicated below, by the following method:

[X] by electronically mailed notice from the court on the date set forth below;

William M. Manlove
Office of the City Attorney
1221 SW Fourth Avenue, Suite 430
Portland, OR 97204
bmanlove@ci.portland.or.us

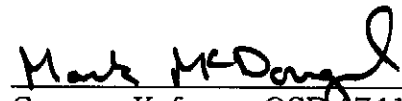
Eric Wilson
Lane Powell
601 SW 2nd Ave., Suite 2100
Portland, OR 97204
wilsone@lanepowell.com
Attorney for People for the Ethical
Treatment of Animals

Herbert Grey
Attorneys at Law
4800 SW Griffith Ave., Ste. 320
Beaverton, OR 97005
hgrey.law1@verizon.net
Attorney for Plaintiffs

Jill Odell
4800 SW Griffith Ave., Ste. 320
10015 SW Terwilliger Blvd.
Beaverton, OR 97005
jillodell@verizon.net
Attorney for Plaintiffs

Jonathan A. Clark
960 Liberty Street SE, Suite 250
Salem, OR 97302
jonathan@jaclawoffice.com
Attorney for Plaintiffs

DATED: May 11, 2007



Gregory Kafoury, OSB #74166
Mark G. McDougal, OSB #89086
Natalie McDougal, OSB #04250 (admission pending)